1	The Honorable James L. Roba	art
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7	UNITED STATES DISTRICT COURT	
8	WESTERN DISTRICT OF WASHINGTON AT SEATTLE	
9	UNITED STATES OF AMERICA,	
10	Plaintiff, ) No. 2:12-cv-01282-JLR	
11	v. ) DECLARATION OF ) STEVE MILETICH	
12	CITY OF SEATTLE,	
13	Defendant.	
14		
15		
16	l, Steve Miletich, hereby declare as follows:	
17	1. I am a reporter for the Seattle Times (the "Times"), a daily newspaper, where I	
18	have been employed since 1999. I make this Declaration based on personal knowledge. I am	
19	one of the Times reporters covering the captioned lawsuit and the settlement agreement entered	d
20	between the City of Seattle and Department of Justice.	
21	2. One requirement of the settlement agreement is that the parties jointly select a	
22	"Monitor" to assess the City's compliance with the agreement, and to assist in its	
23	implementation. On behalf of the Times, on September 11, 2012, I submitted a Public Records	S
	DECLARATION OF STEVE MILETICH  (2:12-cv-01282-JLR) — 1  DWT 20410956v1 0040702-000170  Davis Wright Tremaine LLP  LAW OFFICES Suite 2200 1201 Third Avenue Scattle, WA 98101-3045 206 622.3150 main 206 757 7700 fax	

Act request to the City of Seattle, seeking all resumes and related documents submitted to the City by applicants for the Monitor position. Attached hereto as **Exhibit A** is a true and correct copy of that request.

3. I understand that the City and Department of Justice have proposed, and the Court has provisionally entered, a protective order that would require confidentiality of all "follow-up" material submitted by Monitor candidates, including but not limited to budget and staffing information. To the extent such follow-up material is held by the City of Seattle, it falls within the scope of my September 11 public records request. Further, I anticipate that I and other Times reporters will make additional public records requests related to the Monitor and to the settlement agreement generally.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 24th day of September, 2012, at Seattle, Washington

Steve Miletich

## CERTIFICATE OF SERVICE 1 I hereby certify that I electronically filed the foregoing with the Clerk of the Court using 2 the CM/ECF system which will send notification of such filing to the following: 3 michael.diaz@usdoj.gov 4 J. Michael Diaz jenny.a.durkan@usdoj.gov Jenny A. Durkan 5 jonathan.smith2@usdoj.gov Jonathan Smith kerry.keefe@usdoj.gov Kerry Jane Keefe Michael Johnson Songer michael.songer@usdoj.gov 6 Michelle Leung michelle.leung@usdoj.gov 7 Rebecca Shapiro Cohen rebecca.cohen@usdoj.gov Thomas E. Perez tom.perez@usdoj.gov 8 Timothy D. Mygatt timothy.mygatt@usdoj.gov jean.boler@seattle.gov Jean M. Boler 9 peter.holmes@seattle.gov Peter Samuel Holmes brian.maxey@seattle.gov Brian G. Maxey Sarah K. Morehead sarah.morehead@seattle.gov 10 11 I certify under penalty of perjury that the foregoing is true and correct. Executed at Seattle, Washington this 24th day of September, 2012. 12 13 14 s/Eric M. Stahl Eric M. Stahl, WSBA #27619 Davis Wright Tremaine LLP 15 1201 Third Avenue, Suite 2200 Seattle, WA 98101-3045 16 Ph: 206.622.3150 Fax: 206.757.7700 Email: ericstahl@dwt.com 17 18 19 20 21 22 23

## **EXHIBIT A**

From: Steve Miletich

Sent: Tuesday, September 11, 2012 10:26 AM

'matthew.jaeger@seattle.gov'

To: 'matthew.jaege Cc: 'Mills, Kimberly'

Public-disclosure request Subject:

Sept. 11, 2012

Seattle City Attorney's Office

Attention: Matthew Jaeger, Public Disclosure officer

Re: Applications to serve as SPD monitor

Under the state Public Disclosure Act, I request:

All of the letters of interests, resumes and any other related documents submitted to the city to serve as the court-appointed monitor overseeing Seattle police reforms negotiated between the city and the Department of Justice.

If possible, I would ask that this request be expedited.

Thank you,

Steve Miletich Reporter The Seattle Times (206) 464-3302